<u>REMARKS</u>

Claims 1-25 and 49-61 and are pending in this application. Claims 26-28 have been cancelled. New claims 49-61 have been added to more specifically claim the invention. Support for the amended claims can be found in the specification. No new matter has been introduced.

Claims 1-25 were rejected under section 103(a) as being unpatentable over U.S. patent 5,866,949 (Schueller) and U.S. patent 6,054,337 (Solberg). Reconsideration and allowance of the claims are respectfully requested for at least the following reasons.

No Suggestion to Combine

There is no suggestion to combine Schueller and Solberg. Schueller discusses a single chip package, and Solberg discusses a multichip package. There is no discussion in Schueller that the technique be used for a multichip package of Solberg to obtain benefits as desired by Schueller. There are numerous differences and inconsistencies between Schueller and Solberg, too many to list here. For example, in Schueller, a front face (with bonding pads) of the die 52 is facing away from substrate 83. In Solberg, both dies 350 and 364 have a front face facing toward substrate 320. Solberg has compliant pads 371 to support the first and second chips. This is not the same nonpolymer support structure 50 of Schueller. There is no discussion of how the nonpolymer support structure 50 of Schueller can be integrated with Solberg, especially since there are two chips and conductive traces 338 must connect chip 364 with substrate 320. If Schueller's nonpolymer support structure 50 were placed between the substrate 320 and the traces 338 (of Solbert), this would short out the conductors and the package would not be functional.

Therefore, there is no suggestion to combine Schueller and Solberg. Furthermore, even if Schueller and Solberg were combined, the combination would be a nonfunctional package. The combination would <u>fall short</u> of the present invention as recited in the claims.

Claims 1-25

These claims should be allowable over the prior art because Schueller and Solberg, individually or in combination, do not show or suggest each and every feature recited in the claims as discussed.

Further, for example, claim 1 recites "the first thickness of the silicon die is <u>less</u> than the second thickness." Schueller and Solberg do not show or suggest this.

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Furthermore, claims 2-19 are dependent on claim 1 and should be allowable for at least similar reasons. These claims recited additional features and should also be allowable for these additional reasons.

Claims 20-25 also recite features not shown or suggested in Schueller and Solberg. Claims 20-25 should be allowable.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted.

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